

**Fill in this information to identify the case:**

Debtor 1 Allison J. Forguson

Debtor 2 \_\_\_\_\_  
(Spouse, if filing) \_\_\_\_\_

United States Bankruptcy Court for the: Middle District of PA  
(State)  
Case number 1:19-bk-05173-HWV

## Form 4100R

### Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

#### Part 1: Mortgage Information

Name of creditor:	Pingora Loan Servicing, LLC	Court claim no. (if known):
		7
Last 4 digits of any number you use to identify the debtor's account: *****4211		
Property address:	1821 Lexington Avenue	
	Number	Street
	_____	
	Middletown	PA
	City	17057
	State	ZIP Code

#### Part 2: Prepetition Default Payments

Check one:

Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.

Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ \_\_\_\_\_

#### Part 3: Postpetition Mortgage Payment

Check one:

Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 03 / 01 / 2025  
MM / DD / YYYY

Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due: (a) \$ \_\_\_\_\_

b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$ \_\_\_\_\_

c. **Total.** Add lines a and b. (c) \$ 0.00

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on: \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_  
MM / DD / YYYY

**Part 4: Itemized Payment History**

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- all payments received;
- all fees, costs, escrow, and expenses assessed to the mortgage; and
- all amounts the creditor contends remain unpaid.

**Part 5: Sign Here**

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

*Check the appropriate box::*

I am the creditor.  
 I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

x /s/ Wendy Locke  
Signature

Date 02 / 20 / 2025

Print Wendy Locke  
First Name Middle Name Last Name

Title Agent for Creditor

Company Aldridge Pite, LLP

If different from the notice address listed on the proof of claim to which this response applies:

Address 3333 Camino del Rio South, Suite 225  
Number  Street

San Diego CA 92108  
City State ZIP Code

Contact phone (858) 750 - 7600

Email wlocke@aldridgepite.com

**Certificate of Service**

I hereby certify that a copy of the foregoing Response to Notice of Final Cure Payment was served on the parties listed below by postage prepaid U.S. Mail, First Class or served electronically through the Court's ECF System at the e-mail address registered with the Court on

Date: February 20, 2025

Chapter 13 Trustee: Jack N Zaharopoulos  
Trustee Address: Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
info@pamd13trustee.com

Trustee Email:

Debtor's Counsel Name: Kara Katherine Gendron  
Debtor's Counsel Address: Mott & Gendron Law  
125 State Street  
Harrisburg, PA 17101  
Debtor's Counsel Email: karagendron@gmail.com

Debtor 1 Name: Allison J. Forguson  
Debtor's Mailing Address: 1821 Lexington Avenue  
Middletown, PA 17057

/s/ Ciara M. Pumicpic